

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - Detroit

IN THE MATTER OF:

CITY OF DETROIT, MICHIGAN

Debtor.

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

**STIPULATION FOR  
ORDER RESOLVING MICHIGAN PROPERTY TAX RELIEF, LLC'S  
MOTION FOR RELIEF FROM THE AUTOMATIC STAY AND FOR  
WAIVER OF PROVISIONS OF FED.R.BANKR.P. 4001 (a) (3)**

Movant, Michigan Property Tax Relief, LLC by and through counsel, Osipov Bigelman, P.C., Debtor,  
City of Detroit, Michigan, by and through counsel, Jones Day stipulate to the entry of the attached order granting  
relief from stay consistent with the terms of the attached order.

**OSIPOV BIGELMAN, P.C.**

**JONES DAY**

/s/ William C. Blasses

/s/ Heather Lennox (WCB w/consent)

YULIY OSIPOV (P59486)  
WILLIAM C. BLASSES (P73945)  
Attorneys for Michigan Property  
Tax Relief, LLC  
20700 Civic Center Drive, Suite 310  
Southfield, MI 48076  
(248) 663-1800  
[wcb@osbig.com](mailto:wcb@osbig.com), [yo@osbig.com](mailto:yo@osbig.com)

HEATHER LENNOX (OH0059649)  
Attorneys for City of Detroit, Michigan  
901 Lakeside Avenue  
Cleveland, OH 44114-1190  
(216) 586-3939  
[hlennox@jonesday.com](mailto:hlennox@jonesday.com)

July 30, 2013

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - Detroit

IN THE MATTER OF:

CITY OF DETROIT, MICHIGAN

Debtor.

Chapter 9  
Case No. 13-53846  
Hon. Steven W. Rhodes

**ORDER RESOLVING MICHIGAN PROPERTY TAX RELIEF, LLC'S MOTION FOR  
RELIEF FROM THE AUTOMATIC STAY AND FOR  
WAIVER OF PROVISIONS OF FED.R.BANKR.P. 4001 (a) (3)**

Upon consideration of the parties' stipulation resolving Michigan Property Tax Relief, LLC's Motion for Relief from the Automatic Stay and for Waiver of Provisions of Fed. R. Bankr. P. 4001 (a)(3) (the "Motion"), and the Court being duly advised of the premises;

IT IS ORDERED that:

- 1) Relief from that automatic stay applicable under 11 U.S.C. § 922(a) and 11 U.S.C. § 362(a) is GRANTED for the limited purpose of allowing the Movant and its clients to take all steps necessary to file property tax appeals against the City of Detroit. However, Movant and its clients shall not take any action to prosecute the appeals or collect any refund of any pre-petition property tax overpayment absent further order of this Court.
- 2) This Court finds that Rule 4001 (a) (3) of the Federal Rules of Bankruptcy Procedure is waived and Michigan Property Tax Relief, LLC, and its clients may immediately file and commence property tax appeals against the City of Detroit.

**EXHIBIT A**